

Kevin S. Sinclair, State Bar Number 12277  
*ksinclair@sinclairbraun.com*

SINCLAIR BRAUN LLP  
16501 Ventura Blvd, Suite 400  
Encino, California 91436  
Telephone: (213) 429-6100  
Facsimile: (213) 429-6101

Attorneys for Defendant  
NORTH AMERICAN TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE  
PER L.R. IA 11-1(b)

Gary L. Compton, State Bar No. 1652  
2950 E. Flamingo Road, Suite L  
Las Vegas, Nevada 89121

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE  
COMPANY,

Defendant.

Case No.: 2:21-cv-00415-KJD-VCF

**STIPULATION TO STAY CASE**

Defendant North American Title Insurance Company (“NATIC”), on the one hand, and plaintiff Bank of American, N.A. (“BANA”), on the other hand, hereby stipulate and agree as follows:

This is one of many actions pending before the Nevada state and federal courts involving a Lender’s alleged entitlement to coverage under a title insurance policy following an HOA foreclosure sale. BANA filed this specific action in Nevada’s Eighth District Court on March 9, 2021;

NATIC removed this case to the United States District Court on March 11, 2021. The parties have since engaged with one another about the possibility of settling this and other similarly situated matters involving these specific parties. Due to the number of claims involved,

the parties anticipate it may take several months to complete negotiations. In order to preserve resources during this process, the parties stipulate and agree that this matter should be stayed.

**NOW THEREFORE**, BANA and NATIC hereby **STIPULATE** and **AGREE** as follows:

1. This action shall be **STAYED**;
2. Either Party may move to lift this stay at any time.
3. The Parties shall provide the District Court with a joint status update regarding the status of their settlement negotiations ninety (90) days after entry of the order on this stipulation.
4. In the event this matter does not settle, the parties will submit a proposed scheduling order to the Court.

Dated: April 5, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant  
NORTH AMERICAN TITLE INSURANCE  
COMPANY


Dated: April 5, 2021

WRIGHT, FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

**IT IS SO ORDERED.**

Dated this 6th day of April, 2021.

  
KENT J. DAWSON  
UNITED STATES DISTRICT JUDGE